-X

Jonathan S. Chernow (JSC-7339)
WHITE, FLEISCHNER & FINO, LLP
140 Broadway, 36th Floor
New York, NY 10005
(212) 487-9700
Attorneys for Defendants Brinks Global Services USA, Inc. and Brinks, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DOWN HOW AVEY GEDVICES INC

RETAIL TRAVEL SERVICES, INC.,

Plaintiff,

-against-

BANK OF AMERICA, N.A., BRINKS GLOBAL SERVICES USA, INC. and BRINKS, INC.,

ANSWER TO DEFENDANT BANK OF AMERICA'S CROSSCLAIMS_____

Docket No.: 07 CV 4617 (CM)

Defendants.

Defendants BRINK'S GLOBAL SERVICES, U.S.A., INC., sued herein incorrectly as BRINKS GLOBAL SERVICES USA INC. and BRINK'S, INCORPORATED, sued herein incorrectly as BRINKS, INC. [hereinafter "the BRINKS Defendants"], by their attorneys, WHITE, FLEISCHNER & FINO, LLP, as and for their Answer to Defendant BANK OF AMERICA, N.A.'S [hereinafter "BANK OF AMERICA"] CrossClaims, hereby allege as follows, upon information and belief:

____X

AS AND FOR THE BRINKS DEFENDANTS' ANSWER TO BANK OF AMERICA'S FIRST CROSSCLAIM___

1. Deny each and every allegation contained in paragraph "41". of BANK OF AMERICA'S FIRST CROSSCLAIM.

AS AND FOR THE BRINKS DEFENDANTS' ANSWER TO BANK OF AMERICA'S SECOND CROSSCLAIM____

2. Deny each and every allegation contained in paragraph "42". of BANK OF AMERICA'S SECOND CROSSCLAIM.

AS AND FOR THE BRINKS DEFENDANTS' ANSWER TO BANK OF AMERICA'S THIRD CROSSCLAIM

3. Deny each and every allegation contained in paragraph "43". of BANK OF AMERICA'S THIRD CROSSCLAIM.

AS AND FOR THE BRINKS DEFENDANTS' ANSWER TO BANK OF AMERICA'S FOURTH CROSSCLAIM

4. Deny each and every allegation contained in paragraph "44". of BANK OF AMERICA'S FOURTH CROSSCLAIM.

AS AND FOR THE BRINKS DEFENDANTS' ANSWER TO BANK OF AMERICA'S FIFTH CROSSCLAIM___

5. Deny each and every allegation contained in paragraph "45". of BANK OF AMERICA'S FIFTH CROSSCLAIM.

WHEREFORE, the BRINKS Defendants demand judgment dismissing BANK OF ANERICA'S CROSSCLAIMS, together with the costs and disbursements of this action.

Dated: New York, New York September 12, 2007

Yours, etc.,

WHITE FLEISCHNER & FINO, LLP

By:

Jonathan S. Chernow, Esq. (JSC-7339)

Attorneys for Defendants

BRINK'S GLOBAL SERVICES

U.S.A, INC., s/h/i as BRINK'S GLOBAL

SERVICES USA, INC. and BRINK'S,

INCORPORATED, s/h/i as BRINKS, INC.

140 Broadway - 36th Floor

New York, New York 10005

(212) 487-9700

Our File No.: 404-12961-D-JSC

TO: (See Attached Affidavit)

STATE OF NEW YORK))ss: COUNTY OF NEW YORK)

N. Yvonne Miranda, being duly sworn, deposes and says:

That I am not a party to the within action, am over 18 years of age and reside in New York, New York.

That on September 12, 2007 deponent served the within ANSWER TO DEFENDANT BANK OF AMERICA'S CROSSCLAIMS upon the attorneys and parties listed below by overnight mail

TO:

Christopher M. Schierloh, Esq. CASEY & BARNETT, LLC Attorney for Plaintiff 317 Madison Avenue, 21st Floor New York, New York 10017 (212) 286-0225

Costantine A. Despotakis, Esq. WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP Attorneys for Defendant BANK OF AMERICA N.A. 3 Gannett Drive

White Plains, New York 10604

N. Yvonne Miranda

Sworn to before me this 12th day of September, 2007

Notary Public

C. WENDY A. JANTT Cary Public, State of Co. You No. 01JA5031 - Co. Colfred in Blooms. Co. Sec.

Jan Explina Jan

entered in the office of the clerk of the within named Court on

NOTICE OF

ENTRY

that an Order of which the within is a true copy will be presented for settlement to the Hon.

one of the judges of the within named Court, at, on, at.

NOTICE OF **SETTLEMENT**

Dated:

WHITE FLEISCHNER & FINO, LLP

Attorneys for Defendants Brinks Global Services USA, Inc. and Brinks, Inc. **140 BROADWAY NEW YORK, N.Y. 10005**